

A wide-angle aerial photograph of a wind farm. In the foreground, a large white wind turbine stands prominently on a green field. To its right, a long, straight line of similar turbines stretches across the landscape, which is divided into green agricultural fields. In the background, more turbines are visible in the distance, some situated in a body of water under a clear blue sky with light clouds.

Impact Report 2025

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Foreword



Mark Campanale
Founder and CEO

2025 was a year in which the realities of the energy transition became harder to ignore. The transition is underway and accelerating.

Electrification continued to expand, electric vehicle adoption grew and renewable power capacity increased across major markets. At the same time, record emissions, continued fossil fuel investment, geopolitical tensions and policy uncertainty created a more complex environment for capital allocation. The result is a growing disconnect between market expectations and energy system reality.

Carbon Tracker exists to address that disconnect by aligning capital markets with the energy transition. We analyse how changes in energy demand, technology and climate policy reshape asset values and investment decisions, helping investors, policymakers, regulators and companies better understand transition risk, avoid capital misallocation and identify where corporate strategies are no longer consistent with a climate-constrained future.

Our work is grounded in a simple but powerful insight – first demonstrated in our early work – that financial markets continue to assume there are few constraints on identifying, financing and developing new fossil fuel reserves, despite the limits imposed by a climate-constrained world. The scale of this misalignment is clear: the fossil fuel reserves already held by publicly listed companies alone, if combusted, exceed the global carbon budget consistent with the Paris Agreement’s goal of limiting warming to well below 2°C. Existing investments to develop these reserves are already at risk. This means no new investment is required to develop additional reserves.

In 2025, this approach was reflected in how our analysis was used:

to inform investor scrutiny of oil and gas expansion, contribute to regulatory and policy discussions on financial resilience and disclosure and support a more evidence-based public debate on energy transition pathways. These are the outcomes by which we judge our impact: whether our analysis helps improve decisions and enables investor stewards to challenge project expansion, strengthens accountability and sharpens understanding of transition-related risk within the financial system.

That need remains urgent. The world is undergoing a profound clean energy revolution. The rise of wind, solar and battery energy storage systems is transforming power and transport markets. In most, if not all, parts of the world, these technologies are already cheaper and more effective than fossil fuel-based systems. This is expected to drive a peak in oil and gas demand, with profound consequences for the energy sector and global climate outcomes.

Carbon Tracker’s work focuses on the financial consequences of this shift – including asset impairment, retirement obligations and the implications for company disclosures and investment decisions.

For capital markets, this creates a dual challenge. There is increasing risk for assets that depend on continued fossil fuel demand, and wider economic risk if the transition is delayed or disorderly. At the same time, there is growing opportunity in the technologies driving the transition.

As the transition progresses, we continue to apply this financial-risk lens across sectors – from oil and gas to aviation, automotive and steel. Our purpose remains unchanged: to challenge risky new fossil fuel investment and ensure capital allocation decisions are resilient in a climate-constrained world.



Our vision

A fully decarbonised and resilient global economy aligned with net-zero pathways consistent with the Paris Agreement.

Our mission

Our mission is to accelerate the global energy transition by helping financial markets recognise and price transition risk. Central to this is challenging market assumptions about the viability of the fossil fuel-based energy system and supporting more informed capital allocation decisions that are aligned with the Paris Agreement's goal of limiting global warming to well below 2°C.



How we define impact

At Carbon Tracker, we define impact as the real-world change our work enables – shifts in capital allocation, effective investor stewardship, regulatory action, changes in reporting requirements, investment decisions and corporate behaviour that move us closer to a resilient, just, net-zero future.

Our principal indicators of impact are declining investment in fossil fuel reserves development and rising capital allocation to low-carbon energy. By highlighting the misalignment between capital expenditure and the remaining carbon budget, we support better-informed decision-making and help prevent the creation of stranded assets.

We deliver this impact through a combination of high-quality data, independent analysis and tools, supported by targeted engagement with investors, policymakers, regulators and standard setters. Our insights are designed to influence the rules, incentives and behaviours that shape the financial system, and are amplified through strategic communications and financial media.



Building awareness

Impact begins with awareness. We ensure our research and insights are accessible and visible to key audiences, embedding new knowledge into financial discourse and laying the foundation for informed decision-making. We also work to influence public and financial debate, ensuring that transition risks and opportunities are understood beyond institutional audiences and reflected in wider market narratives.

Deepening engagement

We then move from visibility to direct engagement with investors, policymakers, regulators and financial institutions. Through sustained dialogue and collaboration, we build the relationships and trust needed for our work to inform strategy, stewardship priorities, risk assessment and capital allocation.

Driving action

Impact is realised when this engagement leads to tangible change. This is where our work contributes directly to shifts in financial flows, regulatory outcomes and corporate strategy. This includes stewardship that discourages continued capex into fossil fuel capacity or fossil fuel-dependent assets, investment to support climate-positive strategies, policy reforms, and improved disclosures.



Impact in practice

Shaping market narratives and investment debate

Through our research, engagement and communications, Carbon Tracker continues to contribute to mainstream financial debate on the future of fossil fuel investment and the pace of the energy transition.

One indicator of the broader market shift Carbon Tracker has long highlighted is the decline in investment in new fossil fuel reserves. Analysis cited by Goldman Sachs shows that the resource life of major oil and gas projects has fallen by around 60% over the past decade. Evidence from the International Energy Agency reveals that the proportion of free cash flow being distributed to shareholders in the form of share buybacks and dividends has been rising in recent years,

rather than continuing to invest in exploration and subsequent production growth. This reflects growing market recognition of stranded asset risk – an issue Carbon Tracker has highlighted since its inception.

While new oil and gas capex stagnates, annual investment in renewables, grids and electrification, at over USD2.2 trillion per annum, is now more than double fossil fuel supply investment. These trends increasingly reflect themes Carbon Tracker has consistently highlighted, including declining reserve lives, weakening long-term fossil fuel demand assumptions and growing investor scrutiny of capital discipline across the sector.

In 2025, our work focused on how changing demand dynamics are accelerating this shift. For example, in [The Quiet Retreat](#), we highlighted how electrification is expected to drive a peak in global

gasoline demand, with electric vehicles projected to displace millions of barrels per day of oil demand by 2030.

Carbon Tracker also contributed to wider public and financial debate through platforms including featuring on the Outrage and Optimism podcast: [The End of Oil? Inside the Hidden Decline of Fossil Fuels | Earth Day Special](#) where we discussed growing evidence that financial markets are signalling an accelerated energy transition.

And in making the case for this fundamental shift away from fossil fuels towards renewables, Carbon Tracker also joined O&G industry chair Sir Jeremy Greenstock on the 'Thinking the Unthinkable' podcast for the episode [Disputing the Fossil Fuel Future](#), debating the case for that shift.



Impact summary



“Carbon Tracker plays a critical role within the broader ecosystem of organisations working at the intersection of finance and climate change. Their rigorous, data-driven analysis has been instrumental in shaping both academic discourse and real-world financial decision-making.”

Professor Ellen Quigley,
Finance for Systemic Change, University of Cambridge

Research outputs

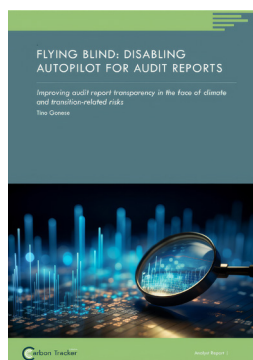
44 TOTAL OUTPUTS

19 reports, **2** responses
7 blogs, **8** company profiles,
8 accounting assessments.



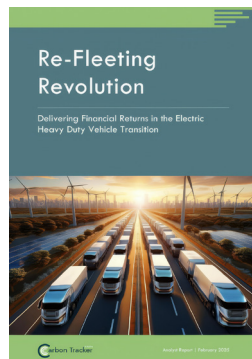
Flying Blind: Accounting and Audit Regulation

Part of the 'Flying Blind' series, assesses whether accounting and audit regulation is keeping pace with climate and transition risk in company financial statements. It finds continuing gaps and calls on regulators to require clearer, more consistent disclosure.



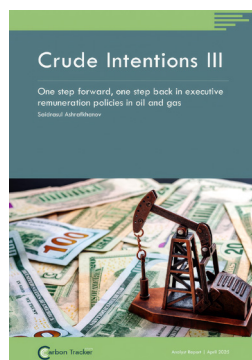
Flying Blind: Disabling Autopilot for Audit Reports

Part of the Flying Blind series, this note looks at how audit reports handle climate and transition-related risks and finds auditors too often on "autopilot." It sets out how greater transparency in audit reporting would better protect investors.



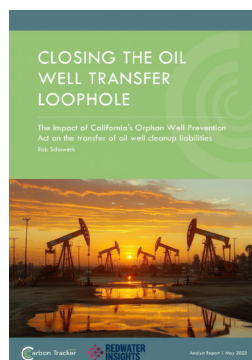
Re-Fleeting Revolution: Delivering Financial Returns in the Electric Heavy Duty Vehicle Transition

Analyses the financial case for electrifying the global heavy-duty vehicle fleet, showing where the switch to electric trucks can deliver returns for operators and investors. Argues that re-fleeting to electric HDVs is increasingly a commercial opportunity rather than only a climate obligation.



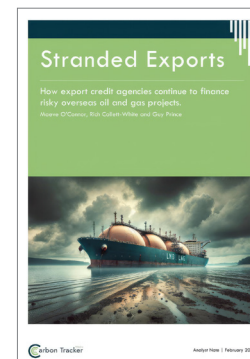
Crude Intentions III: One step forward, one step back in executive remuneration policies in oil and gas

The third instalment in the Crude Intentions series analyses executive pay across oil and gas, finding mixed progress: some improvement in remuneration policies alongside continued incentives to grow production. It argues pay structures still reward growth at odds with a peaking-demand world.



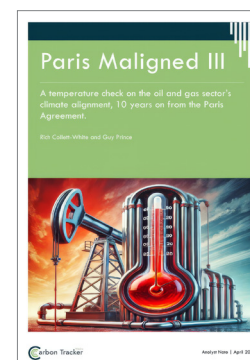
Closing the Oil Well Transfer Loophole

Examines California's Orphan Well Prevention Act and how it addresses the transfer of oil-well clean-up liabilities to weaker operators. Assesses whether the law closes the loophole that leaves taxpayers exposed to the cost of orphaned wells.



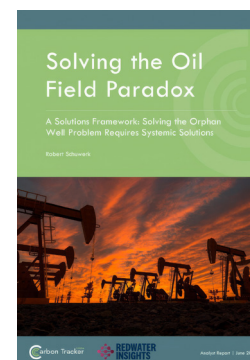
Stranded Exports

Examines how export credit agencies continue to underwrite risky overseas oil and gas projects despite government climate commitments. Warns that this public finance exposes taxpayers to stranded-asset risk as fossil fuel demand approaches its peak.



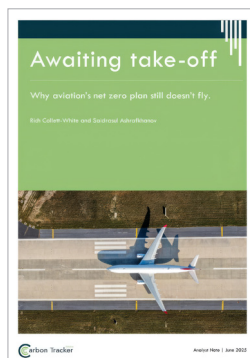
Paris Maligned III

A decade on from the Paris Agreement, this note is a temperature check on how far oil and gas companies' plans remain out of step with global climate goals. It finds the sector's production and emissions trajectories still fall well short of Paris alignment.



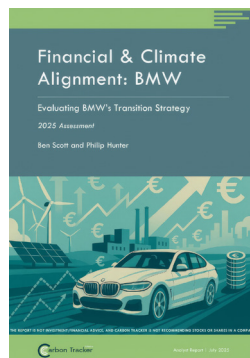
Solving the Oil Field Paradox

Sets out a solutions framework for the "oil field paradox," where ageing wells generate too little value to fund their own clean-up. Argues that tackling the orphan-well problem requires systemic policy solutions rather than case-by-case fixes.



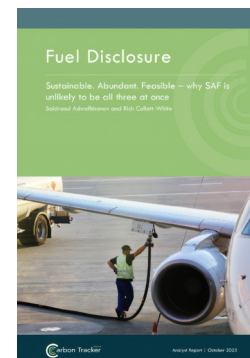
Awaiting take-off

Assesses the aviation sector's net zero plans and finds a persistent gap between stated ambitions and credible delivery. Concludes that key industry players are not yet aligning their strategies with their own decarbonisation targets.



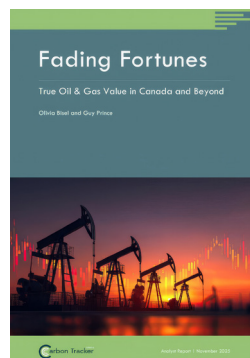
Financial & Climate Alignment: BMW

Building on Carbon Tracker's automotive research, this report examines BMW's financial and climate alignment as the car market electrifies. It assesses how well the manufacturer's strategy and investment plans match a decarbonising vehicle market.



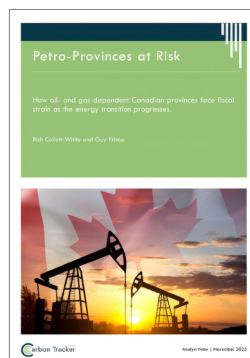
Fuel Disclosure

Scrutinises aviation's reliance on sustainable aviation fuel, arguing that alternative jet fuels are unlikely to be simultaneously sustainable, abundant and affordable. It cautions investors and policymakers against overestimating SAF's potential to decarbonise flying.



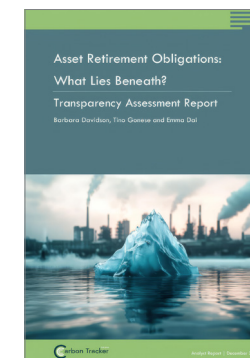
Fading Fortunes

Reassesses the true value of oil and gas assets in Canada and beyond, arguing that continuing to prioritise upstream growth risks destroying shareholder value as the transition erodes future demand. It shows how returning capital to shareholders tends to beat chasing new production.



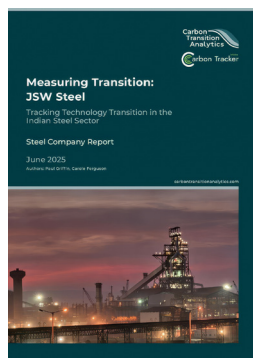
Petro-Provinces at Risk

Examines how Canadian provinces heavily dependent on oil and gas revenues face mounting fiscal strain as global fossil fuel demand declines. It flags the exposure of provincial budgets and the need to plan for lower future resource income.



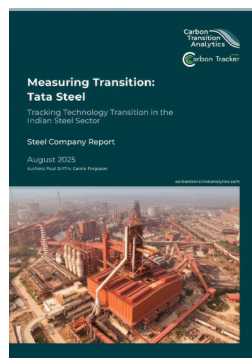
Asset Retirement Obligations: What Lies Beneath?

Oil and gas companies carry large liabilities to retire and clean up ageing assets, but inconsistent disclosure of these asset retirement obligations leaves investors unable to see the true scale of the risk. The report maps these reporting gaps and sets out how more consistent disclosure would let investors price the hidden costs.



Measuring Transition: JSW Steel

The first in a series on India's steel majors, assessing JSW Steel's readiness to move to lower-carbon steelmaking technologies. It weighs the company's expansion plans against its climate targets and trade exposure.



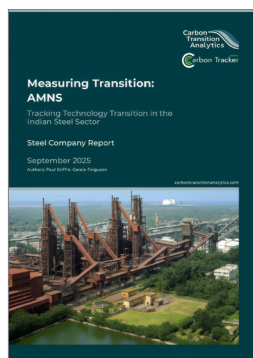
Measuring Transition: Tata Steel

The second report in the Indian steel series assesses Tata Steel's transition readiness across its Indian and international operations. It examines the technology choices and investment needed to decarbonise its steelmaking.



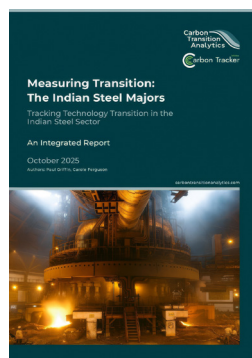
Measuring Transition: JSPL

The third report in the Indian steel series evaluates Jindal Steel & Power's exposure to the low-carbon transition. It weighs the company's growth plans against available decarbonisation technology and its climate targets.



Measuring Transition: AMNS

Assesses the transition readiness of ArcelorMittal Nippon Steel (AMNS) India. It examines how the joint venture's expansion and technology plans align with decarbonising the steel sector.



Measuring Transition: The Indian Steel Majors

A synthesis of the Indian steel series, comparing expansion plans, climate targets and trade exposure across India's largest steelmakers. It highlights the risks and opportunities the sector faces as global markets decarbonise.

Other outputs

Responses

- [Carbon Tracker's response to the UK Government's Consultation on Transition Plan Requirements](#) (1 Sep 2025)
- [SASB Standards on Oil and Gas](#) (26 Nov 2025)

Blogs

- [Climate and Nature, The Pivotal Year. What does 2025 hold?](#) (16 Jan 2025)
- [NGFS Scenarios and the Damage Done](#) (5 Mar 2025)
- [New NGFS Short-Term Scenarios For Central Banks & Supervisors](#) (30 Jun 2025)
- [Chemical Mismatch: Value Chain Under Strain](#) (16 Jul 2025)
- [Turning Insight into Action](#) (13 Oct 2025)
- [Carney's Tragedy of the Horizon and how to break it](#) (31 Oct 2025)
- [The Quiet Retreat: Why the oil and gas industry is implementing its own decline, even as the IEA resurrects an old growth scenario](#) (12 Nov 2025)

Company profiles

All company profiles are published on Carbon Tracker's [Company Profiles](#) webpage.

- CNRL (2 May 2025)
- Suncor (2 May 2025)
- Chevron (15 May 2025)
- ExxonMobil (15 May 2025)
- Cenovus (15 May 2025)
- bp (15 May 2025)
- Shell (15 May 2025)
- TotalEnergies (15 May 2025)

Accounting Assessments

Accounting assessments are also published on Carbon Tracker's [Company Profiles](#) webpage.

- Dow 2023 (16 Jan 2025)
- Caterpillar 2023 (16 Jan 2025)
- Heidelberg 2023 (16 Jan 2025)
- Mercedes-Benz 2023 (22 Jan 2025)
- Stellantis 2023 (22 Jan 2025)
- Volkswagen 2023 (25 Feb 2025)
- Saint Gobain 2023 (6 Mar 2025)
- Glencore 2023 (27 May 2025)



Awareness

MEDIA OUTREACH

1.5k media mentions,
3.1 billion total editorial reach.



LinkedIn

21,193 followers (12.3% increase vs Dec 2024).

Website

266,121 page views, **123,000** active users.

Data portal visitors

1,162 active users in 2025 vs. 952 in 2024.

Report Downloads

CT website **9,710** reports, **1,371** company profiles,

FI platforms **4,676**, total downloads (with other platforms, including company profiles) **15,757**.



Newsletter 8,584 subscribers.



How the next financial crisis starts.



UK Government to allow oil and gas extraction near existing North Sea fields.



Calls for Drax to be forced to fully disclose its biomass sourcing.



Death, violence and endless delay: Inside Africa's most troubled energy project.



Elon Musk blasts US official for blatantly false claim: 'Tragic'.



'Drill, Baby, Drill' Or End Of Oil: What Is Net Zero For Oil And Gas.



Mark Carney's fossil fuel pivot bewilders climate experts and business leaders.



Revealed: European 'green' investments hold billions in fossil fuel majors.

Engagement

Webinars

18 webinars,
including co-hosted sessions with notable partners...

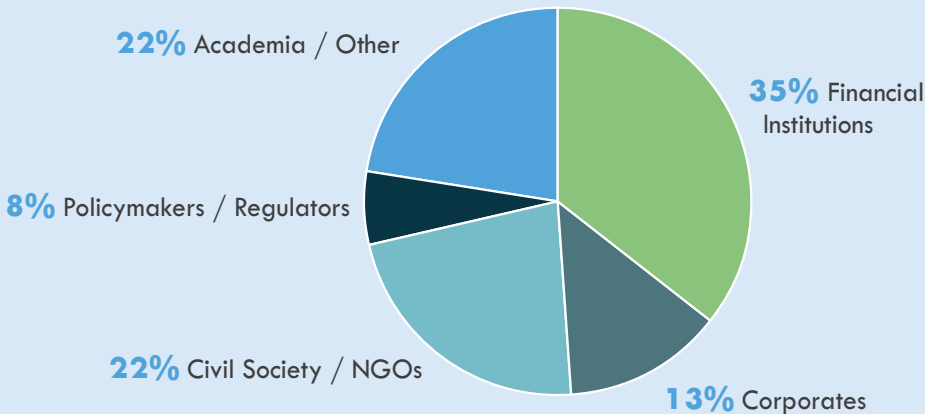


1,094 attendees.

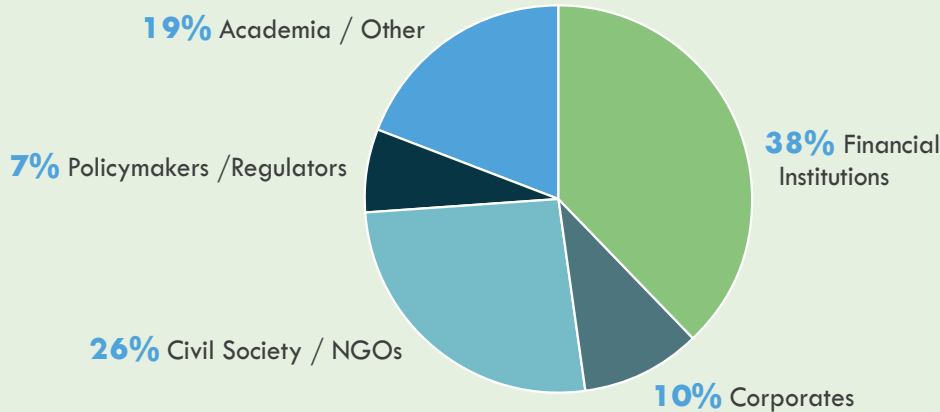
1,783 additional views
of our webinars on YouTube.



Webinar attendees breakdown



Stakeholder Engagement Breakdown



Speaking events **90+** speaking engagements.

Event highlights:



London Climate Action Week 21–29 Jun, London.

- Reset Connect panel “Building a Sustainable Portfolio: Decarbonisation Strategies” (Mark Campanale).
- 3 Carbon Tracker hosted breakfast briefings (right).



New York Climate Week 21–28 Sep, New York.

- Ceres roundtable “Championing Businesses & Investors’ Freedom to Act on Climate Risk” (Mark Campanale).
- Middlebury/Fordham panel “Natural Capital, Systemic Risk & Tipping Points” (Mark Campanale).



European Forum Alpbach 16–29 Aug, Alpbach.

- Climate-track roundtables & labs (Mark Campanale).



FT Climate & Impact Summit 22 May, London.

- Panel “Transforming transport & urbanisation: building sustainable cities & mobility systems”.



LAPFF Annual Forum 6 Jul, London.

- Presentation & panel – oil & gas demand destruction: the petrochemical & LNG pivot.



CEE Sustainable Finance Summit 19–21 May, Prague, CEE region’s largest.

- “Climate risk management & the sustainability lens in banking” – in conversation, chaired by Prof Ben Caldecott (Mark Campanale).



Sustainable Investment Symposium 9 Oct · London, IFoA flagship, 2nd edition.

- Closing session “Turning Insight into Action” (presentation & panel).



Spotlight

LCAW Breakfast Briefings (Carbon Tracker Hosted).

A Carbon Tracker morning series across London Climate Action Week - one briefing a day, one research theme each:

- 23 Jun – Missing Climate Risks in Financial Statements & Audit.
- 24 Jun – Heavy Duty Vehicle Re-Fleeting.
- 27 Jun – Stranded Strategies? Oil & Gas in the Transition.

Policy

Influencing financial regulation on climate-related disclosure

Carbon Tracker's work has contributed to ongoing regulatory efforts to strengthen the integration of climate-related risks into financial regulation and corporate disclosures. In response to our 2024 proposal for the introduction of an Atmospheric Viability Test (AVT) for inclusion in prospectus materials, developed in partnership with ClientEarth, the UK Financial Conduct Authority (FCA) acknowledged strong stakeholder support and committed to a future work programme.

The FCA also indicated that it will continue engaging with international standard-setting bodies on integrating climate risks into financial disclosures and exploring ways to provide investors with more consistent climate-related data and scenarios. Building on this foundation, Carbon Tracker is starting to engage with financial policymakers and regulators in the EU on how prospectus regulation can more effectively address climate risk and fossil fuel investment.

Strengthening regulatory scrutiny of climate risk in pension funds

Building on developments in 2024, when the UK Pensions Regulator (TPR) referenced Carbon Tracker's analysis in its review of climate-related disclosures by occupational pension schemes, our work has continued to contribute to growing scrutiny of how climate risk is assessed within pension fund governance.

In 2025, Carbon Tracker's research highlighted how traditional financial modelling approaches used by pension funds may underestimate systemic climate risks. This work, spanning both the public and private sector schemes, has gained recognition from industry bodies including the Local Authority Pension Fund Forum.

Throughout the year, Carbon Tracker engaged major asset owners, including Norges Bank Investment Management and Allianz, to support the integration of climate-aligned modelling into long-horizon pension governance. We also hosted a roundtable with the Norwegian research institute CICERO and with the Principles for Responsible Investment (PRI) during London Climate Action Week.

Carbon Tracker also used its position on the UKSIF Policy Committee to increase attention on system-level climate risk within UKSIF's strategic agenda. Additional engagement through forums including the Westminster Energy Forum, and through partners such as the Climate Action Coalition have helped broaden dialogue with policymakers and other decision-makers.





Supporting coal transition financing solutions

Our PALEM financial model, developed to support the transition away from coal power to renewable energy in economies in the Global South, has been shared with foundations, investors, and policy partners across Asia, starting with a roadshow in the Philippines. Engagements with regional stakeholders including several government-affiliated agencies such as the Department of Energy, and alongside the Southeast Asia Energy Transition Partnership, are helping to explore how the model can inform real-world coal phase-out strategies.

Following outreach with key stakeholders involved in the Philippines' energy transition, Carbon Tracker has been invited to present the PALEM model and insights from its regional roadshow to additional partners across Asia.

Strengthening scrutiny of fossil fuel infrastructure projects

Carbon Tracker's analysis of emissions assumptions for major energy projects has contributed to increased scrutiny of proposed carbon capture infrastructure in the UK. Following publication of The Real Emissions of Peterhead CCS, campaign groups used our findings to support engagement with policymakers and stakeholders.

In 2025 SSE revised and resubmitted its Environmental Impact Assessment for its Peterhead gas CCS proposal. This reflects how Carbon Tracker's analysis can strengthen scrutiny of emissions assumptions in major energy infrastructure proposals.



Oil & Gas

In 2025, Carbon Tracker's oil and gas work focused increasingly on how weakening long-term demand expectations, growing investor scrutiny of capex discipline and accelerating electrification are reshaping assumptions about fossil fuel expansion.

Supporting investor engagement on oil and gas transition risk in Canada

Canada was a major focus for Carbon Tracker in 2025, reflecting the country's role as the largest OECD oil producer. We partnered with Climate Engagement Canada as an official research provider, supporting coordinated engagement among 62 investors, representing USD16.3 trillion in AUM, in their engagements with Canada's largest emitters.

Our sovereign focused programme also turned to Canada with our reports *Fading Fortunes* and *Petro Provinces at Risk*. In partnership with Environmental Defence Canada (EDC) and the International Institute for Sustainable

Development (IISD), this work informed policy and stakeholder discussions on the fiscal and corporate risks facing Canada's oil and gas dependent provinces.

This work was supported through an investor and stakeholder roadshow across Canada, including events with major financial institutions and market participants. In Toronto, Carbon Tracker addressed around 150 financial market participants at a Sustainable Finance Summit panel, while in Edmonton we presented our analysis at an Environmental Defence Canada-hosted event, including representatives from government, industry, academia, civil society and labour organisations.

Investor action and corporate accountability

Carbon Tracker's analysis continues to inform investor stewardship and corporate engagement across the oil and gas sector, including coordinated investor engagement through Climate Action 100+, helping investors challenge oil and gas majors on transition strategy, LNG expansion and capital allocation plans.





In 2025, Erste Asset Management applied our Crude Intentions III analysis in its 2025 voting season, while Anthropocene Fixed Income Institute (AFII) confirmed use of our methodologies across its programmes.

Our research was also used by financial institutions, such as Aberdeen PLC and members of Climate Action 100+ to assess the credibility of oil and gas majors' emissions strategies, capital expenditure plans, executive remuneration policies, petrochemical expansion strategies and LNG expansion risks.

Through briefings hosted by Institutional Investors Group on Climate Change (IIGCC), Ceres, Aviva, Erste Asset Management's Engagement Think Tank, and the Climate Bonds Initiative, hundreds of practitioners engaged directly with our 2025 oil and gas profiles and transition frameworks.

Our analysis also informed engagements with Shell and ExxonMobil, with investors reporting varied levels of responsiveness from companies when challenged with our findings. ShareAction and ACCR filed a shareholder resolution at Shell, and FollowThis raised related questions at the Shell AGM, all aligning with the transition and LNG concerns highlighted in our research.

Influencing policy and regulatory decisions on fossil fuel development

Carbon Tracker's analysis played a visible role in shaping policy outcomes and regulatory decisions affecting fossil fuel development in 2025.

In the Netherlands, the government and Nederlandse Aardolie Maatschappij B.V. (NAM) – a Shell and ExxonMobil joint venture – agreed to halt new gas extraction under the UNESCO protected Wadden Sea. Local communities and campaign groups publicly credited our analytical support for strengthening the evidence base behind their advocacy.

In the UK, government guidance for North Sea oil and gas developers was strengthened, following consultation, in which Carbon Tracker highlighted critical gaps.

Following the publication of Stranded Exports, which identified Mozambique LNG as a high-risk development under energy transition scenarios, UK Export Finance withdrew support for the project.





Supporting investor scrutiny of financial disclosures

Carbon Tracker's analysis continues to support investor scrutiny of corporate financial disclosures and climate-related risk, leading to increased engagement with regulators, standard-setters and companies.

Our work has supported Climate Action 100+ investor stewardship and corporate engagement. It has informed company-specific analysis and technical accounting discussions involving companies including ConocoPhillips and BP, and proxy voting guidelines or solicitations at institutions including Miller Howard, Railpen and Sarasin & Partners. Following our London Climate Action Week event, EOS at Federated Hermes Ltd also continued dialogue with EY on climate-related accounting issues. Our first-year Climate Engagement Canada assessments increased awareness of gaps in financial reporting and audit reports, informing engagements with Canada's largest emitters at AGMs, and prompting in-depth discussions with regulators and audit firms.

All these demonstrate how investors are using Carbon Tracker's research to assess the alignment of financial statements with climate-related risk.

In 2025, the Institutional Investors Group on Climate Change (IIGCC) published Investor Expectations: Integrating Climate-related risks and Uncertainties in Financial Statements, which references our Climate Action 100+ assessment results and [Flying Blind: In a Holding Pattern](#). This informs companies, audit committees and independent auditors about the financial reporting information that investors need to make informed capital allocation decisions.

Influencing accounting and standard setting

Carbon Tracker's work, including our Flying Blind reports on audit and regulation, contributed to investor and regulatory discussions on supervision and oversight, accounting standards and climate-related financial disclosure in 2025. We provided expert input to a UK investment manager's comment letter to the Financial Accounting Standards Board's (FASB's) 2025 Agenda Consultation, clarifying interpretations of accounting standards and emphasising the need for companies to disclose quantitative accounting assumptions and ensure consistency between companies' sustainability disclosures and financial statements.

Our joint response with Ceres and the Climate Accounting and Audit Project to the same consultation highlighted insufficient disclosures of key estimates and assumptions related to Asset Retirement Obligations (AROs). The response helped prompt at least nine additional investor letters, demonstrating momentum and strengthening the investor voice. Internationally, IPE's coverage of IASB developments cited Carbon Tracker, reflecting our growing influence on global standard setting discussions. Senior regulators and market participants have also engaged informally yet substantively with our analysis, demonstrating its increasing practical value.

Furthermore, a former Chief Accountant to the Securities and Exchange Commission has referenced our Flying Blind series when discussing the SEC's climate disclosure rules.

“From all of us at Ceres, we wanted to take a moment to sincerely thank you for your invaluable partnership on our investor accounting work (CA100+ and beyond).”

Morgan LaManna, Director, Investor Network, Ceres

Extending reach and building data capacity

Data is increasingly important. A prominent UK asset manager recognised the value of our reviews by expressing interest in using our datasets to support their AGM voting escalation.

Our research is also increasingly embedded in academic and professional training. Universities are teaching using Flying Blind, and our research is featured in the CFA Institute's Climate Risk, Valuation and Investing Certificate materials.

As part of a global governance conference we were invited to hold non-executive director workshops on how audit committees and external auditors can incorporate climate risk factors into financial reporting and audit processes.

Driving improved disclosure of asset retirement obligations

Carbon Tracker's work on asset retirement obligations (AROs) has contributed to increased investor scrutiny of how companies disclose liabilities associated with fossil fuel assets.

In 2025, a Climate Action 100+ blog highlighted Valero's recognition of significant AROs following a reassessment of refinery asset lives, calling for more consistent and forward-looking disclosure across the US refining sector. The analysis referenced Carbon Tracker's research and earlier engagement, including the joint letter to the FASB, amplifying investor concerns around off balance sheet AROs. This reflects growing investor focus on the need for consistent disclosure about decommissioning obligations and the associated liabilities. Our [Asset Retirement Obligations: What Lies Beneath?](#) report, which scored oil and gas company disclosures based on recent accounting guidance, has informed auditor and regulator engagement.





Automotive

Accelerating the shift to electric mobility

2025 underscored the strength of our Automotive programme. Decisive electrification is reshaping the global mobility landscape. Across markets, technologies and policy arenas, electric mobility is accelerating the movement of capital and shaping national planning.

The shift is increasingly visible in how manufacturers approach strategy and capital allocation. In 2025 Toyota, one of the sector's most resistant automakers to fully battery electric pathways, requested our Oil Companies in Disguise 2024 report after hearing of it through a Japanese NGO. Their engagement shows that our research is now permeating even the most reluctant corners of the industry.

Our Financial & Climate Alignment: BMW proved to be valuable to a variety of stakeholders assessing automotive transition strategies. Asset managers highlighted the strength of its data-driven analysis, in helping investment teams price the financial impacts of electrification. Several also expressed interest in applying this approach to other global OEMs and the heavy duty vehicle sector, signalling rising demand for our investment-ready analysis across the industry.

Policymakers are also increasingly drawing on our robust transition modelling. The UK Climate Change Committee's use of our EV S-Curve analysis in its Seventh Carbon Budget demonstrates how predictable adoption trajectories are now informing national planning and long-term infrastructure decisions.



Heavy duty vehicles: a rapidly emerging frontier

A similar recalibration is unfolding in heavy duty transport. Our ReFleeting Revolution analysis and its associated webinar attracted interest from more than 180 different organisations over a wide range of stakeholder backgrounds, showing that the historically slow-to-electrify trucks and buses sector is increasingly seen as a major area for decarbonisation investment opportunity.

“Carbon Tracker’s analysis provides useful, data-driven insights into how automotive companies are positioning for the transition to electric mobility. The focus on capital expenditure, cash flow dynamics and production capacity helps investors better understand the financial implications of the shift away from internal combustion engines.”

John Teahan, Redwheel

Strengthening investor scrutiny of transition pathways in the steel sector

Carbon Tracker's steel research programme supported investors in assessing the transition readiness of major steel producers in India and identifying risks of long-term carbon lock-in in one of the world's most emissions intensive sectors. This work marked a significant deepening of our activities in the Global South.

Delivered in partnership with Carbon Transition Analytics, the programme was Carbon Tracker's first dedicated initiative in the steel sector, extending our work into hard-to-abate sectors. Through company level assessments of major Indian steel producers and an integrated sector report, we translated complex technological issues into financially relevant insights to inform capital allocation decisions.

We engaged directly with financial institutions, including, among others, BNP Paribas, Robeco and MN to discuss how this analysis could support their ongoing stewardship of steel companies. Feedback from these discussions indicated that the insights shared were useful in informing internal analysis and engagement considerations.

Supporting investor engagement tools

The analysis also informed the development of wider investor engagement frameworks. Insights from the programme were incorporated into the IIGCC Steel Tool for Engagement, supporting its coverage of trade related carbon risks such as exposure to the Carbon Border Adjustment Mechanism (CBAM), with the aim of helping investors frame more targeted and effective engagement questions for steel producers.





We wish to thank all our Carbon Tracker 2025 funders.

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